

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ALLIANCE FOR AUTOMOTIVE
INNOVATION

Plaintiff,

vs.

MAURA HEALEY, ATTORNEY GENERAL
OF THE COMMONWEALTH OF
MASSACHUSETTS in her official capacity,

Defendant.

C.A. No. 1:20-cv-12090-DPW

PLAINTIFF'S WITNESS LIST

Pursuant to the Amended Scheduling Order (Dkt. at 138) and Order Regulating Non-Jury Civil Trial ¶ II(4)(a), Plaintiff Alliance for Automotive Innovation (“Auto Innovators”) identifies its witnesses below.

Witnesses Appearing for Auto Innovators at Trial

The following witnesses, listed alphabetically by last name, will testify in person at trial on behalf of Auto Innovators. Affidavits of the direct testimony of each witness are filed herewith.

Fact Witnesses

1. Kevin Baltes, Director – Product Cyber Security, General Motors Corp.
2. Mark Chernoby, Chief Technical Compliance Officer, FCA US LLC
3. Steve Douglas, Vice President, Auto Innovators
4. Kevin Tierney, VP Global Cybersecurity, General Motors Corp.

Expert Witnesses

5. Bryson Bort, expert
6. Daniel B. Garrie, expert

In addition, to minimize the scope of deposition designations presented to the Court, Auto Innovators has agreed with Defendant Attorney General Maura Healey (“Defendant”) that with respect to in-person witnesses, the parties will not object to cross-examination beyond the scope of witness’ direct testimony. Accordingly, Auto Innovators may solicit testimony from Defendant’s in-person witnesses—including Aaron Lowe, Greg Potter, Craig Smith, and Brian Romansky—that is beyond the scope of their direct examinations.

Witnesses Appearing for Auto Innovators by Deposition Designation Only

Auto Innovators is designating deposition testimony of Taylor Mitchell and may counter-designate deposition testimony for any witnesses whose deposition testimony is designated by Defendant.

Dated: May 27, 2021

Respectfully submitted,

PLAINTIFF ALLIANCE FOR
AUTOMOTIVE INNOVATION

By its attorneys,

/s/Laurence A. Schoen

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non-registered participants on May 27, 2021.

/s/ Laurence A. Schoen
Laurence A. Schoen